

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) Case No. 23-20273-GLT
Danielle Rae Bower,)
Debtor,) Chapter 13
Danielle Rae Bower,)
Movant,) Hearing Date: May 31, 2023 @ 11:00 AM
vs.) Related Doc. No. 20, 30
No Respondent.) Document No.

STATUS REPORT

AND NOW, comes the Debtor, Danielle Rae Bower, by and through her attorney, Donald Calaiaro and Calaiaro Valencik, and presents the below Status Report pursuant to the Text Order issued by the Court on April 20, 2023 (Doc. No. 30), and avers the following in support thereof:

1. Danielle Rae Bower, ("Debtor") filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code on February 6, 2023.
2. On March 3, 2023, the Debtor filed her Chapter 13 Plan. Doc. No. 20.
3. On March 16, 2023, Kennedy Bower, an unsecured creditor of the Debtor, filed an Objection to the Debtor's proposed Chapter 13 Plan. Doc. No. 26.
4. The Debtor is the owner of a life estate in the property located at 4101 Pokolodi Circle, Addison, TX 75001 ("Property") under Texas law, as the surviving spouse of Rex Bower.
5. The Debtor's proposed Chapter 13 Plan states the Debtor will list and sell her interest in the Property to help fund her proposed plan.
6. The Debtor asserts Kennedy Bower made oral promises to her to pay certain expenses related to the Property.

7. Kennedy Bower's objection to the Debtor's proposed Chapter 13 Plan disputed that the Debtor holds a life estate and asserts the Debtor cannot sell the property without consent of the holder of the fee simple interest in the Property. Kennedy Bower also disputed that she owes the Debtor any sum of money for expenses related to the Property and counterclaims that she is owed money for expenses related to the Property.

8. The 341 Meeting of Creditors and an initial plan conciliation hearing was held on March 20, 2023.

9. At the initial plan conciliation, a contested confirmation hearing was requested and scheduled for April 19, 2023.

10. On April 7, 2023, the Chapter 13 Trustee, Ronda Winnecour, filed an Objection to the Debtor's proposed Chapter 13 Plan. Doc. No. 28.

11. On April 19, 2023, a contested confirmation hearing was held.

12. At the hearing on April 19, 2023, counsel for the Debtor requested a continuance so that the Debtor could work on coming to a resolution with Kennedy Bower on her objection to the Debtor's proposed Chapter 13 Plan.

13. The Court issued a Text Order on April 20, 2023, scheduling the continued contested confirmation hearing for May 31, 2023. See Doc. No. 30.

14. In the Text Order, the Court also mandated that the Debtor file a status report on or before May 24, 2023. See Doc. No. 30.

15. After thorough discussion and negotiation between the parties, the Debtor and Kennedy Bower have come to a resolution in principle.

16. The Debtor has prepared a Motion to Approve Settlement Pursuant to Bankruptcy Rule 9019. It has been circulated to counsel for Kennedy Bower. The parties

expect that counsel for Kennedy Bower will respond to that draft within five (5) days.

17. Once approved, the Debtor will file the appropriate Motion to Approve Settlement Pursuant to Bankruptcy Rule 9019 with the Court.

18. The parties request that the contested confirmation hearing scheduled for May 31, 2023 be rescheduled to a new date in June.

It is so reported.

Respectfully Submitted,

Dated: May 24, 2023

BY: /s/ Donald R. Calaiaro
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